

Appendix C: Frequently Asked Questions (FAQs) About Secondary Transition

1. How do three year reevaluations and transition assessments relate?

The purpose of the reevaluation is to determine if the student continues to need special education services, supports or activities. If the student continues to need special education services, the information from the reevaluation is used to determine the content of the IEP. A reevaluation may not occur more than once a year and must occur at least once every three years, unless parent and school agree otherwise.

Transition assessment is done on an ongoing basis (at least annually) to identify the student's needs for secondary services supports and activities which will be documented in the IEP. The inclusion of transition assessment in three year reevaluation is a natural step that will save time and ensure the student's needs are met.

2. Do I need parent consent before completing transition assessments?

Parent consent must be given prior to collecting *new* information for the purposes of transition planning. Parent consent is not needed to review existing information or when the assessment is something in which all students participate, or done as a routine activity or assignment within the curriculum.

3. Can adult service providers be invited without parent/student consent?

If an adult service agency is not providing services to the student prior to the IEP meeting, but may provide services sometime in the future, then the parent (or student who has obtained majority age) must consent to invite the adult service provider. If an agency is providing services to the student *prior* to the IEP meeting, then the LEA may invite the agency as someone who has special knowledge or expertise about the student. Parent consent is not needed when the agency is providing services *prior* to the IEP meeting.

4. What happens when IEP team members do not agree on the postsecondary expectations for living, learning, and working?

The postsecondary expectations for living, learning and working should reflect consensus agreement of the IEP team, as these are the statements that drive the identification of needed secondary services, supports and activities. To the extent possible, IEP team members should engage in frank discussions of the skills needed for anyone to pursue the postsecondary expectation and those that the student would need to accomplish in order to pursue the postsecondary expectation. The result of the discussion should be a postsecondary expectation that each member of the team agrees to support. At times, members specific expectations may differ for the postsecondary activity, but can still support the postsecondary expectation as the services provided would be similar. For example, a student may wish to go directly to a four year college, while other members of the team may think a community college to be an easier transition. In instances where IEP members disagree with the postsecondary expectation(s) to the extent that they can not support it the dispute should be resolved as with any other IEP dispute.

5. Can I add a new goal as the result of transition assessments if the student is only eligible for one type of service (e.g., reading, math, or writing)?

Once a student is determined eligible for special education services, he or she is eligible for ANY service depending upon individual need. It is possible that an eligible individual may at first only need reading services but with time may need additional services in math or writing or other areas. It is not necessary to re-determine the individual's eligibility for special education. That is done during the three year reevaluation. In fact, IEP teams must, under IDEA, examine all the student's needs as a result of the disability at each annual review.

6. Is Work Experience an AEA or LEA service?

Iowa's new administrative rules identify work experience as an instructional service which means that in most locations it will be provided through the LEA. Iowa's administrative rules define a work experience coordinator as an individual who:

. . . plans and implements sequential secondary programs that provide on- and off-campus work experience for individuals requiring specially designed career exploration and vocational preparation when they are not available through the general education curriculum.

7. What kind of licensure/certification is needed?

Iowa code requires all Iowa teachers to hold a valid teaching license that is issued by the Board of Educational Examiners with the proper endorsements for the services they provide (Iowa Code Sections 272.2 and 272.7). This means that teachers that supervise students in the workplace and plan or monitor educational experiences in the workplace must be properly certified. Given the wide differences in the types of services provided, however, it is sometimes difficult to determine which credentials are appropriate. Guidance based on Iowa code and effective practice is provided below.

The type of credentials needed should be determined based upon the type of work experience services that are provided. If the work-based activity is a job-shadow or job exploration that is a time limited experience to support course/class objectives and is an application of course content, the teacher would not need specialized endorsement in work experience; she or he would of course need to be endorsed in the content area of the class. Teachers in these situations, then, should hold a valid teaching license for the area of instruction that they are providing. No special endorsement in work experience would be needed. For example:

- If a journalism instructor provides educational opportunities in journalism in the worksite for students to *observe* for a limited number of days as part of a journalism class, then the instructor need not hold a special endorsement in work experience.
- If a teacher of students with significant disabilities takes students into the community to *observe* a job or to *teach independent living* skills, such as transportation or other mobility skills, then the instructor need not hold a special endorsement in work experience.

If the work-based activity is intended for the student to develop general employability, job-specific, or technical skills then specialized endorsement in work experience may be necessary. Job development and job placement must be done by, or with, a teacher holding

a special endorsement. That endorsement may be either a multi-occupational coordination endorsement (MOC) or a work-experience coordination endorsement (WEC). For example:

- If a teacher provides educational opportunities in the worksite for students to *perform actual work and learn general or job-specific skills*, then the instructor needs to hold an MOC or WEC endorsement.
- If students work for a significant period of time (e.g., scheduled class periods each week, days/half-days, quarters, semesters) and separate credit is granted for these worksite components, then the teacher doing the job development and job placement must hold an MOC or WEC endorsement.

Once sites have been established and the student placed by an MOC or WEC, the MOC or WEC may continue to monitor the job placement, or another appropriate teacher may monitor the job placement. Formal contact with the person doing the job development and placement should occur to ensure that the job placement continues to meet the student's needs and is in compliance with state and federal regulations. For example:

- A teacher of students with significant disabilities who does not hold an MOC or WEC endorsement and has community-based training sites in which students are placed to learn or perform various aspects of the jobs occurring at that work site, must work in conjunction with a person with the appropriate endorsement (i.e., MOC, WEC) to develop the job site and place students. Once the student is placed, the teacher of the student with significant disabilities may monitor the overall job placement, including evaluation of student performance. Others may be involved in supporting the student on site.

The person providing the specialized work experiences (i.e., holding the WEC/MOC endorsement) may be either an AEA or LEA employee. The district, however, must assign credit according to their procedures. This means that if the person holding the WEC endorsement is an AEA employee, they must work closely with a district representative to work within the district procedures to determine credit appropriate to each student.

Employment services provided through the IEP by collaboration with an appropriate outside agency (e.g., vocational rehabilitation) are not subject to the certification requirements listed above. Each agency or service will have its own requirements for qualified personnel. For example, some districts contract with the local sheltered workshop for supported employment services and other districts have established a contract with Iowa Vocational Rehabilitation Services (IVRS) for a Transition Alliance Program which provides a number of employment services. In these instances personnel employed by the certified rehabilitation provider or through such collaborative agreements are not required to meet the Department of Education's certification requirements.

8. What is the AEA's responsibility to monitor provision of Work Experience?

As with all other special education services, the AEA is responsible to ensure that students with disabilities receive the services they need, and the services are provided by qualified personnel. This means that if the work experience services are not provided to districts through the AEA, the AEA should have a method to ensure that districts are identifying employment services when needed by students and quality services are provided, including that the district person providing the service is appropriately credentialed, as described

above. The AEA should contact the Department for assistance if the AEA encounters non-compliance the district is not willing to correct.

9. Do you have to write a goal?

The IDEA requires “appropriate measureable postsecondary goals” to be included in the IEP. If a student’s “transition services” are “special education” (specially designed instruction), then the student’s IEP is to contain an annual goal (or goals) and describe the special education the student is to receive. If a student’s “transition services” are “related services”, then the IEP should describe those services in the appropriate place. If a student’s postsecondary goals are attainable without special education or related services, then the general education that the student will receive is to be described in the course of study. If a student’s non-instructional transition activities are services that all students receive, the LEA, of course, must provide them. Any accommodations or modifications the student requires to progress in the general curriculum should also be described.

10. When should the IEP team consider continuing secondary special education for students ages 18 to 21 (sometimes known as 4+ programs)?

There are several types of services commonly referred to as 4+ programs. A 4+ program is any program or set of services that are provided for students who have earned a majority of their graduation requirements, but still have unmet needs, usually in the area of learning or work. These programs and services are located at a site other than the high school. They may be located at a community college, in the community through a collaborative program with Iowa Vocational Rehabilitation Services (known as the Transition Alliance Program), or in the community through other providers (e.g., Career Connections).

There are currently nine secondary special education programs on community college campuses in Iowa. The specific services they provide range, depending on the program. Their intent, however, is the same: to provide LEAs with an additional option of meeting needs of students with disabilities. Generally, there are three reasons that an IEP team might decide to send a student with disabilities to a secondary program on a community college campus:

1. The student will go on to college, but her or his learning characteristics and generalization skills necessitate time in the actual setting to be successful.
2. The student will go on to college, but needs to learn specific study/accommodation skills in the actual setting.
3. The student may not be successful independently at a college setting, but with supports will gain specific career and technical skills that will provide for a stronger employment outcome.

It is important to remember that these programs must be available to the student as long as the student needs the services and remains eligible for special education. Also, they are considered secondary programs – not postsecondary education. This means that the student must continue to receive a free appropriate public education. The appendix contains more details about these programs.

Collaborative programs funded by IVRS and the LEA or AEA known as TAPs may extend beyond the 4th year of high school when it has been demonstrated that the student was

unable to adequately develop the work skills necessary for post secondary learning or working goals. However as early as the sophomore year students in TAPs should participate in assessments and work experiences to expose them to vocational options so that by the junior and senior year more advanced and customized training is provided. This will enable the student to be prepared for transition and graduation. Only when the student is not successful in acquiring the skills in the high school years would the student continue in the TAP program for more skill development.

11. Do we have to provide psychological testing so that the student can receive services as an adult?

No. The provision of specific psychometric testing that is needed solely to meet the eligibility requirements of another agency or service is not the responsibility of the educational agency. The transition requirements of IDEA mandate facilitation and coordination with agencies that might provide services to the individual. IDEA does not require the education agency to establish the individual's eligibility for those services. Many areas around the state have developed working procedures that minimize the complications that can arise from the differing eligibility procedures and practices. At the state level, the Support for Accommodations Request (SAR) form is intended to minimize the number of people who will need psychometric testing to receive accommodations at the state level.

Through a collaborative effort the Department of Education and IVRS along with AEA 267 have developed a Collaborative Transition Protocol. The protocol encourages and improves the transition process for students, allows for eligibility determination for IVRS services using existing IEP information, allows for Social Security determinations to be completed without additional teacher documentation, and other adult services (Medicaid Waiver) are studying the protocol for consideration of their needs. This protocol is being expanded into other AEAs if the AEA agrees to the requirements of the protocol.

12. Do I have to complete a Summary for Postsecondary Living, Learning, and Working if I have completed a Supports for Accommodations Request (SAR) form for the same student?

No. Either form can be used for students who are planning to attend an Iowa institution of higher education. Since the SAR will probably be completed prior to the student's exit from high school, it is important to update it when the student does exit.

13. Does IVRS need student/family consent to access student records?

No. IVRS is a division of the Iowa Department of Education and as such, qualifies as an educational agency under 34 CFR, Section 99.3 of the Family Educational Rights and Privacy Act (FERPA). This means that student records can be shared between the school and IVRS without additional consent.